

REPORTS ANALYSIS REFERRAL**TO****OFFICE OF GENERAL COUNSEL****DATE:** April 29, 1999**ANALYST:** Edward D. Ryan

- I. **COMMITTEE:** Colorado Republican Federal Campaign Committee
(C00033134)
John C. Givens, Treasurer (1/30/98-Present)
Joe C. Nunez (5/12/97-1/29/98)
Douglas L. Jones (Pre 1/1/97 to 5/11/97)
1275 Tremont Place
Denver, CO 80204
- II. **RELEVANT STATUTE:** 2 U.S.C. §434(a)(4)(A)(iii)
11 CFR §104.5(c)(1)(iii)(A)
- III. **BACKGROUND:**

Failure to Timely File the 1998 30 Day Post-General Report

The Colorado Republican Federal Campaign Committee ("the Committee") failed to timely file the 1998 30 Day Post-General Report of Receipts and Disbursements covering the period from October 1, 1998 to November 23, 1998. On December 29, 1997, September 30, 1998 and November 5, 1998, Prior Notices were sent to the Committee informing it that the 1998 30 Day Post-General Report was due on December 3, 1998 (Attachments 2, 3 & 4). A Non-Filer Notice was sent to the Committee via mailgram on January 6, 1999 (Attachment 5).

The Reports Analysis Division ("RAD") analyst called the Committee on March 26, 1999 and spoke to Mr. John S. Dorrenbacher, the Assistant Treasurer. The RAD analyst informed him that the Commission still had not received the 1998 30 Day Post-General Report. Mr. Dorrenbacher was advised to send the report in via certified/registered mail as quickly as he could. Mr. Dorrenbacher said the report would be mailed on the following day, March 27, 1999 (Attachment 6).

COLORADO REPUBLICAN FEDERAL CAMPAIGN COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

On March 30, 1999, Mr. Dorrenbacher called and left a message on the RAD analyst's voice mail that the report was sent via certified mail that day (Attachment 7).

On April 7, 1999, the 1998 30 Day Post-General Report was received at the Commission and sent via certified mail dated March 30, 1999*. A cover letter and a press clipping were attached to the report attempting to explain the delayed submission of the report (Attachment 8).

*The RAD analyst spoke to Mr. Dorrenbacher on April 19, 1999 to confirm the certified mail date of the report. A copy of the certified mail receipt was received by the Commission on April 12, 1999.

**FEDERAL ELECTION COMMISSION
1997-1998
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)**

Attachment #1
Page 1

DATE 4/29/1999

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	IMAGE LOCATION TYPE OF FILER
COLORADO REPUBLICAN FEDERAL CAMPAIGN COMMITTEE				ID #C00033134	PARTY QUALIFIED	
CONNECTED ORGANIZATION: 1ST-5TH CONG. DIST. CITIES						
	1997 STATEMENT OF ORGANIZATION - AMENDMENT			12MAR97	2	97FEC/203/2190
	STATEMENT OF ORGANIZATION - AMENDMENT			27MAR97	2	97FEC/205/2510
	MID-YEAR REPORT	368,187	428,386	1JAN97 - 30JUN97	85	97FEC/232/4260
	YEAR-END	220,997	262,120	1JUL97 - 31DEC97	72	98FEC/281/0948
	YEAR-END - AMENDMENT	220,997	262,120	1JUL97 - 31DEC97	5	98FEC/307/3058
	REQUEST FOR ADDITIONAL INFORMATION			1JUL97 - 31DEC97	2	98FEC/299/3443
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL97 - 31DEC97	3	98FEC/305/4351
	1998 STATEMENT OF ORGANIZATION - AMENDMENT			31JAN98	2	98FEC/281/0946
	APRIL QUARTERLY	100,530	114,471	1JAN98 - 31MAR98	37	98FEC/304/1239
	JULY QUARTERLY	167,177	161,336	1APR98 - 30JUN98	32	98FEC/334/3094
	OCTOBER QUARTERLY	159,279	161,778	1JUL98 - 30SEP98	37	98FEC/372/2533
	POST-GENERAL	239,823	241,336	1OCT98 - 23NOV98	33	99FEC/445/4130
	NOTICE OF FAILURE TO FILE			1OCT98 - 23NOV98	2	99FEC/416/0720
	YEAR-END	27,819	28,712	24NOV98 - 31DEC98	15	99FEC/445/4171
	NOTICE OF FAILURE TO FILE			24NOV98 - 31DEC98	2	99FEC/436/1126
1999	MISCELLANEOUS REPORT TO FEC			21APR99	3	99FEC/445/4134
TOTAL		1,291,812	0 1,398,059	0	334	TOTAL PAGES

All Reports Have Been Reviewed

Ending Cash-On-Hand as of 12/31/98: \$2,838.52

Debts and Obligations Owed to the Committee: \$0.00

Debts and Obligations Owed by the Committee: \$27,464.70

YEAR-END REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 29, 1997

WHO MUST FILE

Party committees and PACs (Nonconnected Committees and Separate Segregated Funds) must file a Year-End Report on January 31, 1998.

I. Semi-annual Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	07/01/97 - 12/31/97	01/31/98	01/31/98

II. Monthly Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	12/01/97 - 12/31/97	01/31/98	01/31/98

LABEL

Committees should affix the peel-off label from the envelope to line 1 of the report. Corrections should be made on the label.

COMPLIANCE

Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-FEC forms (except for FEC approved computer generated forms) will be required to refile.

ELECTRONIC FILING

For reports covering activity occurring in 1997 (and later), political committees have the option of filing electronically. If you are interested in this option, review the enclosed handout entitled "Electronic Filing Gets Underway at FEC," and call the Data Division at (800) 424-9530 or (202) 219-3730.

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

** Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

(over)

PARTIES AND PACS

YEAR-END

1998 FILING SCHEDULE

I. QUARTERLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
April Quarterly	01/01/98 - 03/31/98	04/15/98	04/15/98
July Quarterly	04/01/98 - 06/30/98	07/15/98	07/15/98
October Quarterly	07/01/98 - 09/30/98	10/15/98	10/15/98
Pre-General	10/01/98 - 10/14/98	10/19/98	10/22/98
Post-General	10/15/98 - 11/23/98	12/03/98	12/03/98
Year-End	11/24/98 - 12/31/98	01/31/99	01/31/99

II. MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
February	01/01/98 - 01/31/98	02/20/98	02/20/98
March	02/01/98 - 02/28/98	03/20/98	03/20/98
April	03/01/98 - 03/31/98	04/20/98	04/20/98
May	04/01/98 - 04/30/98	05/20/98	05/20/98
June	05/01/98 - 05/31/98	06/20/98	06/20/98
July	06/01/98 - 06/30/98	07/20/98	07/20/98
August	07/01/98 - 07/31/98	08/20/98	08/20/98
September	08/01/98 - 08/31/98	09/20/98	09/20/98
October	09/01/98 - 09/30/98	10/20/98	10/20/98
Pre-General	10/01/98 - 10/14/98	10/19/98	10/22/98
Post-General	10/15/98 - 11/23/98	12/03/98	12/03/98
Year-End	11/24/98 - 12/31/98	01/31/99	01/31/99

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement is triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the day of the election.

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

** Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

REPORT NOTICE**FEDERAL ELECTION COMMISSION****PARTIES AND PACS**

September 30, 1998

I. ALL MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/98 - 10/14/98	10/19/98	10/22/98
Post-General	10/15/98 - 11/23/98	12/03/98	12/03/98

II. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 14

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/98 - 10/14/98	10/19/98	10/22/98
Post-General	10/15/98 - 11/23/98	12/03/98	12/03/98

III. QUARTERLY FILERS THAT DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 14

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Post-General	10/01/98 - 11/23/98	12/03/98	12/03/98

WHO MUST FILE

Party Committees and PACs must follow the above charts in order to determine whether they must file a report 12 days before the general election on November 3 (the Pre-General Report). All Party Committees and PACs, regardless of financial activity, must file a report 30 days after the general election (the Post-General Election Report).

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

** Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

(over)

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24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any Party Committee or PAC that makes independent expenditures aggregating \$1,000 or more during the period beginning October 15 and ending November 1 must report them within 24 hours.

LABEL

Committees should affix the peel-off label from the envelope to line 1 of the report. Corrections should be made on the label.

ELECTRONIC FILING

Political committees have the option of filing electronically. If you are interested in this option, review the enclosed handout entitled "Electronic Filing of Disclosure Reports," and call the Data Division at (800) 424-9530 or (202) 694-1250.

COMPLIANCE

Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-FEC forms (except for FEC approved computer generated forms) will be required to refile.

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

November 5, 1998

*****REMINDER**

REMINDER

REMINDER***

All party committees and PACs (nonconnected committees and separate segregated funds) must file a Post-General Election Report. Reports sent by registered or certified mail must be postmarked by the mailing date (December 3, 1998); otherwise, they must be received by the filing date (December 3, 1998). FEC Form 3X is enclosed.

FOR INFORMATION, CALL: (800) 424-9530 or (202) 694-1100

2510-163-40-66
99.04-394-0157

**WESTERN
UNION**

CONFIRMATION OF MAILGRAM TO: JOHN C GIVENS
WESTERN UNION COMMERCIAL SERVICES
COLORADO REPUBLICAN FED CAMPAIGN CMTE
1275 TREMONT PLACE
DENVER CO 80204

FEDERAL ELECTION COMMISSION
SHAWN WERTH
999 E ST. NW.
WASHINGTON DC 204630001

JANUARY 6, 1999

IDENTIFICATION NUMBER: C00033134

REFERENCE: 30 DAY POST-GENERAL (10/01/1998 - 11/23/1998)

DEAR TREASURER:

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED REPORT OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT, AS AMENDED. YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT. PLEASE DISREGARD THE DECEMBER 28, 1998 MAILGRAM REGARDING THIS REPORT.

IT IS IMPORTANT THAT YOU FILE THIS REPORT IMMEDIATELY WITH THE FEDERAL ELECTION COMMISSION, 999 E STREET, N.W., WASHINGTON, D.C., 20463. A COPY OF THE REPORT OR RELEVANT PORTIONS SHOULD ALSO BE FILED WITH THE SECRETARY OF STATE OR EQUIVALENT STATE OFFICER.

ALTHOUGH THE COMMISSION MAY INITIATE AN AUDIT OR LEGAL ENFORCEMENT ACTION CONCERNING THIS MATTER, YOUR PROMPT RESPONSE AND A LETTER OF EXPLANATION WILL BE TAKEN INTO CONSIDERATION.

IF YOU HAVE ANY QUESTIONS REGARDING THIS MATTER, PLEASE CONTACT EDWARD RYAN ON OUR TOLL FREE NUMBER (800)424-9530. OUR LOCAL NUMBER IS (202)694-1130.

SINCERELY,

JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

8510-16W-10-66

TELECON

ANALYST:	Ed Ryan
COMMITTEE:	COLORADO REPUBLICAN FEDERAL CAMPAIGN COMMITTEE - C00033134
SUBJECT(S):	Failure to file the 1998 30 Day Post General and Year End Reports

DATE:	3/26/99
CONVERSATION WITH:	John S. Dorrenbacher, Assistant Treasurer

I placed a telephone call to the Colorado Republican Federal Campaign Committee ("the Committee") headquarters and talked to Mr. John S. Dorrenbacher, the Assistant Treasurer of the Committee. I informed him that the Commission still had not received the 1998 30 Day Post General or Year End Reports and that the reports had to be submitted no later than April 2, 1999. I told him to send the reports in via certified/registered mail as quickly as he could. He said he would have them in the mail tomorrow, 3/27/99. I said that would be good and reminded him to send them certified/registered mail.

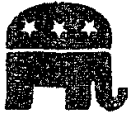
TELECON

ANALYST:	Ed Ryan
COMMITTEE:	COLORADO REPUBLICAN FEDERAL CAMPAIGN COMMITTEE - C00033134
SUBJECT(S):	Mailing the 1998 30 Day Post General and Year End Reports

DATE:	3/30/98
CONVERSATION WITH:	John S. Dorrenbacher, Assistant Treasurer

Mr. Dorrenbacher called and left a message on my voice mail recording that the 1998 30 Day Post General and Year End Reports were mailed by certified/registered mail today.

091014631066

**COLORADO REPUBLICANS**

1275 Tremont Place, Denver, CO 80204
(303) 893-1776 • Fax (303) 629-0459
1 (800) 236-3769

Attachment #8
Page 1 of 4

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

APR 7 2 14 PM '99

March 29, 1999

Mr. Edward D. Ryan
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Identification Number: C00033134

Reference: 30 Day Post General Report (10/01/98-11/23/98) and
January 31 Year-End-Report(11/24/98 - 12/31/98)

Dear Mr. Ryan:

The 30 Day Post General Report (10/01/98 - 11/23/98) and January 31 Year-End-Report (11/24/98-12/31/98) are forwarded herewith.

Unsettled conditions as indicated in the enclosed press clipping (one of several), staff reductions, illness, and bad judgment delayed submission. of reports in a timely manner. New party officers are now in office. It is respectfully requested that the fines and penalties which may be appropriate, be waived.

We regret the inconvenience this matter has caused the Commission.

Sincerely,

John S. Dorrenbacher
Assistant Treasurer

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FIRST THING IN THE MORNING: A recent sunrise over the San Juan Mountains in southwestern Colorado reveals fog blanketing a green valley that stretches east from Chromo. The small town is on U.S. 84 between Pagosa Springs and the New Mexico line.

Locks changed on GOP dissidents

By Barry Horsten

Rocky Mountain News Staff Writer

Republican state Chairman Steve Curtis changed the locks on party headquarters to keep dissident party members from meeting there Friday.

About 16 Republicans, who showed up for a meeting to air disagreements with Curtis found themselves on the sidewalk outside the former West Colfax Avenue fried chicken stand that serves as state headquarters.

Curtis "thinks he owns the building," said Adams County GOP activist Hal Shroyer. "He changes the locks every time he



Philips



Curtis

fires somebody."

"They're cheaper by the dozen," said state GOP Vice Chairwoman Barbara Philips of El Paso County, referring to recent dissension within the party.

Philips, a former state representative who called Friday's

meeting, said the key that didn't fit was new.

It was issued to her after Curtis fired party Executive Director Chris Baker last month.

Curtis said he changed the locks again to keep Philips out.

"We simply don't trust Barbara Philips, period," Curtis said. "We're going to control who has access to our office. If we have a group of people out there who cannot be trusted to do the right thing for the Republican Party, we're certainly not going to give them access to our office."

See GOP on 13A

By John Smith
Rocky Mountain
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**For Other Than An Authorized Committee
(Summary Page)**

**USE FEC MAILING LABEL
OR
TYPE OR PRINT**

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

APR 12 15 PM '93

1. NAME OF COMMITTEE (in full)
COLORADO Republican Federal Campaign Committee

ADDRESS (number and street) ☐ Check if different than previously reported
1275 TREMONT PLACE

CITY, STATE and ZIP CODE
Denver CO 80204

FEDERAL ELECTION
COMMISSION MAIL ROOM
APR 12 15 1993

2. IDENTIFICATION NUMBER
CO 0033134

3. ☒ This committee has qualified as a multicandidate
committee. (see FEC FORM 1M)
PRIOR TO 1-1-94

4. TYPE OF REPORT

(a) ☐ April 13 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report☐ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

February 20

☐ June 20

October 20

☐ March 20

July 20

November 20

□ April 20

August 20

☐ December 20

May 20

September 20

☐ January 31

☐ 12-Day Pre-Election Report for the _____
(Type of Election)

election on _____ in the State of _____

☐ 30-Day Post-Election Report following the General Election

on 11-03-98 in the State of Colorado

(b) Is this Report an Amendment?

☐ YES

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5.	Covering Period <u>10-01-98</u> through <u>11-23-98</u>		
6.	(a) Cash on Hand January 1, 19 <u>98</u>		\$ 7,843.79
	(b) Cash on Hand at Beginning of Reporting Period	\$ 5,244.36	
	(c) Total Receipts (from Line 10)	\$ 239,823.90	\$ 674,811.48
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 245,068.26	\$ 682,655.27
7.	Total Disbursements (from Line 30)	\$ 241,336.06	\$ 678,923.07
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 3,732.20	\$ 3,732.20
9.	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ -	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-694-1100
10.	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 32,918.77	
I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete. <u>Assistant</u>			
Type or Print Name of Treasurer <u>John S. Dorrenbacher</u>			
Signature of Treasurer <u>John S. Dorrenbacher</u>			Date <u>3-30-99</u>

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 9/93)

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> First Class Mail	POSTMARKED
<input checked="" type="checkbox"/> Registered/Certified Mail	POSTMARKED 3/30/99
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other (Specify):	Postmarked and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
J.A.D. PREPARER	4/22/99 DATE PREPARED

(4/98)

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